PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

GENERAL ELECTRIC COMPANY - CONNEAUT BASE PLANT CONNEAUT, OHIO OHD 004 202 735

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	OHD 004 202 735
Date Prepared	:	February 12, 1993
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087OH4M
Prepared by	:	PRC Environmental Management, Inc. (Sandy Anagnostopoulos)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

TABLE OF CONTENTS

LIST OF TABLES

LIST OF FIGURES

EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the General Electric Company (GE) - Conneaut Base Plant (CBP) facility in Conneaut, Ashtabula County, Ohio. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing RCRA facilities for corrective action.

The CBP facility manufactures lamp bases and components. The facility generates and manages the following waste streams: used oil, used oil with small amounts of used antifreeze; used agitene (D001); scrap aluminum; used press oil; scrap glass; burnishing system sludge (D001); perchloric sludge (F001); waste paint (D001); wastewater; and wastewater treatment sludge. The facility has operated at its current location since 1941. The facility occupies 13 acres in an industrial and residential mixed-use area and employs about 125 people. The facility's current regulatory status is that of a small-quantity generator of hazardous waste.

In 1980, the CBP facility submitted a Part A permit application as a generator and treatment, storage, or disposal facility. This application listed container storage (S01) of F001 and F006 wastes and a treatment process (T04) for the neutralization of 100,000 gallons of acid waste (F009) per day. The treatment process (T04) referred to the facility's Wastewater Treatment System (SWMU 10). Because this unit always functioned as an elementary neutralization unit, the F009 waste code used to describe this waste stream appears to have been applied incorrectly. On November 25, 1980, the EPA informed the CBP facility that the treatment sludge, listed as F006 on the facility's Part A permit application, was not considered F006 waste, but made no reference to the F009 waste stream (OEPA, 1986).

The container storage (S01) listed on the facility's Part A permit application referred to the Former Container Storage Area (SWMU 3). The CBP facility submitted a closure plan for SWMU 3 to OEPA on February 22, 1985 (GE, 1985). EPA approved CBP's closure plan on October 8, 1986, and changed the facility's status to a generator of hazardous waste (EPA, 1986). However, no closure certification was found in EPA, OEPA, or facility files. According to

facility representatives, EPA changed the CBP facility's regulatory status to that of a small-quantity generator of hazardous wastes in 1987. The facility currently operates under this status.

The PA/VSI identified the following 10 SWMUs and no AOCs at the facility:

Solid Waste Management Units

1. Current Container Storage Area
2. Container Staging Area
3. Former Container Storage Area
4. Waste Collection Area
5. Scrap Aluminum Accumulation Area
6. Scrap Glass Accumulation Area
7. Burnishing Sludge Accumulation Area
8. Perchloric Sludge Accumulation Area
9. Waste Paint Accumulation Area
10. Wastewater Treatment System

The potential for release from the Current Container Storage Area (SWMU 1), Container Staging Area (SWMU 2), Waste Collection Area (SWMU 4), Burnishing Sludge Accumulation Area (SWMU 7), Perchloric Sludge Accumulation Area (SWMU 8), and Waste Paint Accumulation Area (SWMU 9) to ground water, surface water, air, and on-site soils is low because these SWMUs manage waste in closed, steel, 55-gallon drums located indoors on concrete floors. No releases from SWMUs 1, 2, 4, 7, 8, and 9 have been documented.

The potential for release from the Former Container Storage Area (SWMU 3) to ground water, surface water, air, and on-site soils is low because this unit has been inactive since 1985 and underwent RCRA closure in 1987. No releases from SWMU 3 have been documented. The potential for release from the Scrap Aluminum Accumulation Area (SWMU 5), Scrap Glass Accumulation Area (SWMU 6), and Wastewater Treatment System (SWMU 10) to ground water, surface water, air, and on-site soils is low because SWMUs 5, 6, and 10 manage nonhazardous waste and are located indoors on concrete floors. No releases from SWMUs 5, 6, and 10 have been documented.

The nearest residential area borders the facility on the south across Maple Avenue. The nearest school, Lakeview Elementary, is located 0.5 mile southeast of the facility. The property is surrounded by a 7-foot high chain-link fence.

The nearest surface water body, Conneaut Creek, is located 0.6 mile south of the facility and is used for recreational purposes. Other surface water bodies in the area include Lake Erie, which is located 1 mile north of the facility. Ground water is not used as a source for agricultural, municipal, industrial, or private water supply within a 3-mile radius of the CBP facility.

Sensitive environments are not located on site. The nearest sensitive environment, a wetland measuring about 2 acres, is located 0.2 mile northeast of the facility.

PRC recommends that no further action be taken for any of the SWMUs at the CBP facility at this time.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the General Electric Company (GE) - Conneaut Base Plant (CBP) facility (EPA Identification No. OHD 004 202 735) in Conneaut, Ashtabula County, Ohio. The PA was completed on November 16, 1992. PRC gathered and reviewed information from the Federal Emergency Management Agency (FEMA), the Ohio Environmental Protection Agency (OEPA), Rand McNally Business Traveler's Road Atlas, the U.S. Department of Agriculture (USDA), the U.S. Department of Commerce (DOC), the U.S. Geological Survey (USGS), Woodward Clyde Consultants, and from EPA Region 5 RCRA files. The VSI was conducted on November 17, 1992. It included interviews with facility

representatives and a walk-through inspection of the facility. PRC identified 10 SWMUs and no AOCs at the facility.

PRC completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and 11 inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors.

2.1 FACILITY LOCATION

The CBP facility is located at 880 Maple Avenue in Conneaut, Ashtabula County, Ohio. Figure 1 shows the location of the facility in relation to the surrounding topographic features (latitude 41° 59' 30" N and longitude 80° 34' 45" W). The facility occupies 13 acres in an industrial and residential mixed-use area.

The facility is bordered on the north by tracks of the Norfolk and Western Railroad, on the west by the Foseco Company, on the south by a residential area across Maple Avenue, and on the east by a vacant warehouse owned by the Amy Company across Reig Avenue.

2.2 FACILITY OPERATIONS

The CBP facility is a GE facility that manufactures lamp bases and components. GE has been the sole owner and operator of the CBP facility since the facility's construction in 1941. Before 1941, the property was undeveloped. Several additions have been added to the original plant. Currently, the main building occupies approximately 160,000 square feet. The CBP facility employs 125 people. Employees work three shifts, 5 days a week.

The CBP facility uses presses to form aluminum and brass into lamp bases and components. An insulating ring of glass is formed into some of the bases. During this process, an oxide forms on the lamp bases. This oxide is removed using an on-site burnishing system. The CBP facility also manufactures plastic ballasts for fluorescent light tubes.

One 2,500-gallon underground storage tank (UST) is located on site under the warehouse on the west end of the property. This UST stored heating oil from 1973 to 1979. A collection sump surrounding the UST served as secondary containment in the case of a release. Facility representatives did not know if the UST is constructed of steel or fiberglass or if leak testing has

Non Responsive Water Well Information

ever been conducted on the UST (PRC, 1993d). The UST has been empty since 1979. This UST is currently on a list of USTs that GE intends to remove from several GE facilities nationwide. Facility representatives anticipate that this UST will be removed within the next two years (PRC, 1993c).

Solid waste generated from facility operations and the SWMUs where they are managed are discussed in detail in Section 2.3.

2.3 WASTE GENERATION AND MANAGEMENT

Operations at the CBP facility currently produce eleven waste streams: used oil; used oil with small amounts of antifreeze; used agitene (D001); scrap aluminum; used press oil; scrap glass; burnishing system sludge (D001); perchloric sludge (F001); waste paint (D001); wastewater; and wastewater treatment sludge. The facility's SWMUs are identified in Table 1. The facility layout, including SWMUs, is shown in Figure 2. The facility's waste streams are summarized in Table 2.

Hazardous wastes and nonhazardous used oils are collected in steel 55-gallon drums at the Waste Collection Area (SWMU 4), the Burnishing Sludge Accumulation Area (SWMU 7), the Perchloric Sludge Accumulation Area (SWMU 8), and the Waste Paint Accumulation Area (SWMU 9). When the individual drums of these SWMUs are filled, the drums are moved to the Container Staging Area (SWMU 2) to be logged in by the facility's Safety and Environmental Engineer. The drums are then moved into the Current Container Storage Area (SWMU 1) located adjacent to SWMU 2. SWMU 1 is a 20- by 30-foot room with a concrete floor and block walls. Hazardous wastes and nonhazardous used oils are stored at SWMU 1 until they are transported off site for recycling. Hazardous wastes are not stored at SWMU 1 for greater than 90 days. The CBP facility contracts Chemical Waste Management (CWM) (EPA Identification No. ILD 099 202 681) to pick up hazardous wastes and nonhazardous used oils from SWMU 1 every 70 to 80 days for recycling. All drums stored in SWMU 1 are grounded and stored closed. A drain in the floor leads to a 500-gallon fiberglass UST that would contain any wastes in case of a spill. The CBP facility has not had a spill from SWMU 1. SWMUs 1 and 2 began operation in 1986.

From 1980 to 1985, used degreasing solvents (F001) were stored in the Former Container Storage Area (SWMU 3) until they were transported off site. SWMU 3 measured approximately 5 by 15 feet and was located indoors on a concrete floor. Hazardous wastes were not stored at SWMU 3 for greater than 90 days. SWMU 3 was RCRA-closed in 1986 when EPA approved

TABLE 1

SOLID WASTE MANAGEMENT UNITS

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit[a]	Status
1	Current Container Storage Area	No	Active; less than 90-day storage of hazardous waste
2	Container Staging Area	No	Active
3	Former Container Storage Area	Yes	Inactive; RCRA-closed in 1986
4	Waste Collection Area	No	Active; accumulation of hazardous and nonhazardous waste
5	Scrap Aluminum Accumulation Area	No	Active; accumulation of nonhazardous waste
6	Scrap Glass Accumulation Area	No	Active; accumulation of nonhazardous waste
7	Burnishing Sludge Accumulation Area	No	Active; accumulation of hazardous waste
8	Perchloric Sludge Accumulation Area	No	Active; accumulation of hazardous waste
9	Waste Paint Accumulation Area	No	Active; accumulation of hazardous waste
10	Wastewater Treatment System	No	Active; accumulation of nonhazardous waste

Note:

[a] A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

TABLE 2

SOLID WASTES

Waste/EPA Waste Code[a]	Source	Solid Waste Management Unit
Used oil/NA	Equipment motors	1, 2, and 4
Used oil with small amounts of used antifreeze/NA	Plastics molding and equipment motors	1, 2, and 4
Used agitene/D001	Degreasing parts, equipment, and tools	1, 2, and 4
Used degreasing solvents[b]/F001	Degreasing parts, equipment, and tools	3
Scrap aluminum/NA	Lamp base production	5
Used press oil/NA	Aluminum presses	1 and 2
Scrap glass/NA	Lamp base production	6
Burnishing system sludge/D001	Polishing of lamp parts	1, 2, and 7
Perchloric sludge/F001	Degreasing various metal lamp components	1, 2, and 8
Waste paint/D001	Ballast production	1, 2, and 9
Wastewater/NA	Burnishing system and equipment lubrication	10
Wastewater treatment sludge/NA	Burnishing system and equipment lubrication	10

Note:

[a] Not applicable (NA) designates nonhazardous waste.

[b] No longer generated

CBP's closure plan and changed the facility's status to a generator of hazardous waste (EPA, 1986). The Former Container Storage Area is currently used to store raw materials.

Used oil from equipment motors and used oil with small amounts of used antifreeze from plastics molding and equipment motors throughout the facility are collected in individual steel 55-gallon drums at the Waste Collection Area (SWMU 4). Used agitene (D001) that degreases equipment, parts, and tools is collected in a separate drum at SWMU 4. When the individual drums of SWMU 4 are filled, they are moved to the Container Staging Area (SWMU 2), logged in, and moved to SWMU 1 prior to CWM's arrival. The CBP facility generates about 75 gallons of used oil from equipment motors, about 75 gallons of used oil with small amounts of antifreeze from plastics molding and equipment motors, and about 200 gallons of used agitene (D001) each year (PRC, 1993c).

Presses form sheet aluminum into lamp bases which are then threaded. Scrap aluminum and used press oil is generated during this process. The scrap aluminum is collected, baled, and stored in the Scrap Aluminum Accumulation Area (SWMU 5) until it is picked up for recycling by the original vendor. SWMU 5 is an area measuring about 30 by 50 feet and is located indoors near the presses. The CBP facility generates about 42,500 pounds of scrap aluminum every 3 weeks. Used press oil is collected in steel 55-gallon drums and taken to the Container Staging Area (SWMU 2). The drums are logged in and moved into the Current Container Storage Area (SWMU 1). CWM picks up the used press oil for recycling. The CBP facility generates about 3,500 gallons of used press oil each year (PRC, 1993b).

After the lamp bases have been formed, molten glass is poured into the bases and formed into insulating rings. Scrap glass from this operation is collected at the Scrap Glass Accumulation Area (SWMU 6). SWMU 6 is an area measuring about 10 by 20 feet and is indoors near the molten glass operation. Scrap glass is collected in a roll-off box measuring about 3 by 3 by 15 feet. The scrap glass is not recyclable and is shipped off site to be landfilled at the Doherty Landfill in Geneva, Ohio. The CBP facility generates about 20 cubic yards of scrap glass per week.

The lamp bases are cleaned using a burnishing system to remove the oxide formed on the bases during the insulator process. The lamp bases are placed in a 3-percent citric acid solution. The oxide is then removed from the bases mechanically using a stainless steel media. This process forms a burnishing system sludge (D001), which is collected in the Burnishing Sludge

Accumulation Area (SWMU 7) in a steel 55-gallon drum. When the drum is filled, it is moved to the Container Staging Area (SWMU 2) to be logged. Then the drum is moved to the Current Container Storage Area (SWMU 1) to be transported off site by CWM for recycling. The CBP facility generates about 75 gallons of burnishing system sludge per year.

In addition to incandescent lamp bases, the CBP facility also produces fluorescent lamp bases. Each of these bases has two pins for electrical contacts. The pins are produced at the CBP facility. Until 1989, they were degreased using a perchloroethene solution. The degreasing process resulted in a perchloric sludge (F001) that was collected in the Perchloric Sludge Accumulation Area (SWMU 8). In 1989, the CBP facility began using a centrifuge to degrease the pins. This decreased the CBP facility's annual perchloric sludge generation from 800 gallons to 75 gallons. Perchloroethene is still used to degrease various other metal components, but the CBP facility is looking at alternate degreasing methods in an effort to completely eliminate this waste stream. When the drum at the Perchloric Sludge Accumulation Area is filled, it is moved to the Container Staging Area (SWMU 2) to be logged. Then the drum is moved to the Current Container Storage Area (SWMU 1) to be picked up for recycling by the original vendor of the perchloroethene, Gold Shield Solvents (EPA Identification No. OHD 080 158 702) of Euclid, Ohio.

The CBP facility also produces plastics ballasts. Plastic waste is not produced by this process because any plastic scraps can be reused within the process. A small portion of each ballast is painted. Occasionally, the paint received by the CBP facility is not of adequate quality for this process. This waste paint (D001) is collected in a steel 55-gallon drum at in the Waste Paint Accumulation Area (SWMU 9). If waste paint has been collected in SWMU 9, the drum is moved to the Container Staging Area (SWMU 2) to be logged. Then the drum is moved into the Current Container Staging Area (SWMU 1) to be picked up by CWM and transported to CWM Resource Recovery, Inc. (EPA Identification No. OHD 093 945 293) of West Carrollton, Ohio, where it is recycled. The CBP facility generates about 30 gallons of waste paint per year.

The CBP facility has an on-site Wastewater Treatment System (SWMU 10) to treat wastewater containing solution from the burnishing system and water-soluble oils used to lubricate various equipment parts. The Wastewater Treatment System began operating in 1957. SWMU 10 adjusts the pH of effluent from manufacturing processes and filters the effluent before discharging it to the municipal sewer system. Wastewater treated by SWMU 10 was originally listed on the facility's Part A permit application as F009 waste. Because this unit always functioned as an elementary neutralization unit, the F009 waste code used to describe this waste

stream appears to have been applied incorrectly. SWMU 10 system consists of two reaction tanks, each with a 470 gallon capacity, two retention tanks, each with a 4,400 gallon capacity, and a 150 square foot drum-type filter. Filtering results in wastewater treatment sludge that is collected in a roll-off box at SWMU 10. The wastewater treatment sludge was originally listed on the facility's Part A permit application as F006 waste. In 1980 the CBP facility was informed by EPA that this waste stream was not considered F006 waste (OEPA, 1986). Before 1985, the CBP facility used a Bright-Dip system for cleaning lamp bases. The Bright-Dip System used a solution of nitric and sulfuric acids. Wastewater from this system was piped to the Wastewater Treatment System. During operation of the Bright-Dip System between 1941 and 1985, SWMU 10 generated about 2,000 cubic yards of nonhazardous sludge per year which was landfilled. The Bright-Dip System was disassembled when the Burnishing System was installed in 1985. Currently, the Wastewater Treatment System generates about 130 cubic yards of nonhazardous sludge per year. The sludge is transported off site six or seven times per year and landfilled at the Doherty Landfill in Geneva, Ohio. Effluent from SWMU 10 is discharged to the City of Conneaut's sewer system under Permit No. 490-993.

2.4 HISTORY OF DOCUMENTED RELEASES

There is no history of documented releases of hazardous waste or hazardous constituents to ground water, surface water, air, or on-site soils at the CBP facility.

2.5 REGULATORY HISTORY

On July 15, 1980, the CBP facility submitted a Notification of Hazardous Waste Activity form to EPA as a generator and as a treatment, storage, or disposal facility (GE, 1980a). The CBP facility submitted a RCRA Part A permit application on November 17, 1980 (GE, 1980b). This application listed container storage (S01) of F001 and F006 wastes and a treatment process (T04) for the neutralization of 100,000 gallons of acid waste (F009) per day. The treatment process (T04) referred to the facility's Wastewater Treatment System (SWMU 10). Because this unit always functioned as an elementary neutralization unit, the F009 waste code used to describe this waste stream appears to have been applied incorrectly. On November 25, 1980, the EPA informed the CBP facility that the treatment sludge, listed as F006 on the facility's Part A permit application, was not considered F006 waste, but made no reference to the F009 waste stream (OEPA, 1986).

The container storage (S01) listed on the facility's Part A permit application referred to the Former Container Storage Area (SWMU 3). The CBP facility submitted a closure plan for SWMU 3 to OEPA on February 22, 1985 (GE, 1985). EPA approved CBP's closure plan on October 8, 1986, and changed the facility's status to a generator of hazardous waste (EPA, 1986). However, no closure certification was found in EPA, OEPA, or facility files. According to facility representatives, EPA changed the CBP facility's regulatory status to that of a small-quantity generator of hazardous wastes in 1987. The facility currently operates under this status.

OEPA conducted a RCRA inspection on August 21, 1981, and found the CBP facility to be in complete compliance (OEPA, 1981). Subsequent inspections conducted on June 15, 1982; May 9, 1983; and December 13, 1984; found paperwork deficiencies that were corrected (OEPA, 1982; 1983; and 1985).

The CBP facility is required to have operating air permits for the facility's perchloroethylene vapor degreaser. The facility also had an operating air permit for its Bright-Dip operation. The Bright-Dip operation was discontinued in 1985. The facility has not violated its air permits and has no history of odor complaints from area residents.

The CBP facility is permitted to discharge effluent from the Wastewater Treatment System (SWMU 10) to the City of Conneaut's sewer system under Permit No. 490-993.

PRC found no documentation of National Pollutant Discharge Elimination System (NPDES) or CERCLA activities conducted at the facility.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the facility.

2.6.1 Climate

The climate in Ashtabula County is continental. The average daily temperature is 49 °F. The lowest average daily temperature is 14 °F in January. The highest average daily temperature is 81 °F in July (USDA, 1973).

The total annual precipitation for the county is about 37 inches (USDA, 1973). The mean annual lake evaporation for the area is about 30 inches (DOC, 1968). The 1-year, 24-hour maximum rainfall is about 4 inches (USDA, 1973).

The prevailing wind is from the north. Average wind speed is 13 miles per hour (USDA, 1973).

2.6.2 Flood Plain and Surface Water

The CBP facility is located outside the 500-year flood plain in an area of minimal flooding (FEMA, 1980). The nearest surface water body, Conneaut Creek, is located 0.6 mile south of the facility and is used for recreational purposes. The Conneaut Creek flows northeast about 4 miles into Lake Erie, which is about 1 mile north of the facility. Surface water runoff from the facility is directed toward municipal storm sewers.

2.6.3 Geology and Soils

No site-specific geology and soils information is available. The following information is based on county and regional data.

The CBP facility is located within an area that is geologically defined as the Eastern Lake Section of the Central Lowland Province and commonly referred to as the Lake Plain. The Lake Plain borders Lake Erie and is characterized by a narrow plain with a relatively flat surface ranging between 3.5 and 5 miles in width. The Lake Plain gently slopes towards Lake Erie. The northern margin of the Lake Plain, along the present shoreline of Lake Erie, is in the vicinity of the facility, terminates as a bluff between 20 and 80 feet high. The Lake Plain rises toward the south at a gradient of approximately 10 feet per mile. The southern margin is marked by an abrupt rise in elevation, or escarpment, which also marks the beginning of glacial and moraine deposits. Surface drainage is typically poor because of the relatively flat surface and the nature of the soils of the Lake Plain.

Lacustrine deposits consisting of silts and fine sands reportedly cover the upper surface of the Lake Plain to a depth of 5 to 10 feet. A series of till deposits that are typically composed of dense clayey silts underlie the lacustrine silts and sands. In this area, till generally consists of an unsorted, unstratified mixture of sediments of various sizes often containing small rock fragments

but primarily containing fine-grained sediments. The various till layers are sometimes separated by thin lenses, 4 to 6 inches thick, of more permeable silt or fine sand. The till units extend to the bedrock surface.

Bedrock beneath the site consists of Devonian age shales, which locally may be several hundred feet thick. The uppermost formation is reported to be the Ohio Shale of the Cleveland Member, which is typically a black carbonaceous shale (Woodward Clyde Consultants, 1986).

2.6.4 Ground Water

No site-specific ground-water information is available. The following paragraphs discuss the regional ground-water setting of Ashtabula County.

According to information published by the Ohio Division of Geologic Survey, wells developed in the unconsolidated deposits in the area yield very little ground water [less than 5 gallons per minute (gpm)]. Because of the low permeability of the unconsolidated deposits, wells in these deposits are generally pumped dry quickly and need a considerable amount of time to fully recover. Wells developed in the upper, weathered portion of the shales typically yield less than 3 gpm. Below that depth, very little ground water is available (Woodward Clyde Consultants, 1986).

Ground water is generally considered an unavailable and unimportant source of water in this region. Ashtabula County water comes from Lake Erie. The Conneaut Water Department has no knowledge of any wells within a 3-mile radius of the CBP facility (PRC, 1993a).

2.7 RECEPTORS

The facility occupies 13 acres in a mixed-use area in Conneaut, Ashtabula County, Ohio. Conneaut has a population of about 13,241 (Rand McNally, 1992).

The facility is bordered on the north by tracks of the Norfolk and Western Railroad, on the west by the Foseco Company, on the south by a residential area across Maple Avenue, and on the east by a vacant warehouse owned by the Amy Company across Reig Avenue. The nearest school, Lakeview Elementary, is located 0.5 mile southeast of the facility (PRC, 1993b). The property is surrounded by a 7-foot high chain-link fence.

The nearest surface water body, Conneaut Creek, is located 0.6 mile south of the facility and is used for recreational purposes. Other surface water bodies in the area include Lake Erie, which is located 1 mile north of the facility. Ground water is not used as a source for agricultural, municipal, industrial, or private water supply within a 3-mile radius of the facility. Water supplies in the area are drawn from Lake Erie.

Sensitive environments are not located on site. The nearest sensitive environment, a wetland measuring about 2 acres, is located 0.2 mile northeast of the facility.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the 10 SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

SWMU 1	**Current Container Storage Area**
Unit Description:	This unit is a 20- by 30-foot room indoors with a concrete floor and block walls. Steel 55-gallon drums containing hazardous and nonhazardous wastes are stored here until they are picked up to be recycled by licensed contractors. A floor drain leads to an UST in case of a spill.
Date of Startup:	This unit began operation in 1985.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages used oil, used oil with small amounts of antifreeze, used agitene (D001), used press oil, burnishing system sludge (D001), perchloric sludge (F001), and waste paint (D001). These wastes are picked up for recycling by licensed contractors. Hazardous wastes are not stored at this SWMU for greater than 90 days.
Release Controls:	This unit is located indoors on a concrete floor. A drain in the floor leads to a 500-gallon fiberglass UST. All drums in this unit are grounded and stored closed.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	During the VSI, this unit contained four 55-gallon drums of used agitene (D001) and 29 55-gallon drums of used oil. Each drum was

	stored closed. A cabinet containing products such as paint and solvent was also located in this area. The concrete floor of this unit did not appear to be cracked. PRC noted no evidence of release (see Photograph No. 1).
SWMU 2	**Container Staging Area**
Unit Description:	This unit is indoors on a concrete floor adjacent to the Current Container Storage Area (SWMU 1). No floor drains are present in the area. Steel 55-gallon drums containing hazardous and nonhazardous wastes are moved here before being stored in the Current Container Storage Area (SWMU 1). Drums brought here are logged in daily by the facility's Safety and Environmental Engineer before the drums are moved to SWMU 1.
Date of Startup:	This unit began operation in 1986.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages used oil, used oil with small amounts of antifreeze, used agitene (D001), used press oil, burnishing system sludge (D001), perchloric sludge (F001), and waste paint (D001).
Release Controls:	This unit is located indoors on a concrete floor. All drums are stored closed.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	This unit contained one 55-gallon drum of used oil. The concrete floor of this unit did not appear to be cracked. PRC noted no evidence of release (see Photograph No. 2).

SWMU 3	**Former Container Storage Area**
Unit Description:	This unit measured approximately 5 by 15 feet and was located indoors on a concrete floor. No floor drains were present in the area.
Date of Startup:	This unit began operation in 1980.
Date of Closure:	This unit has been inactive since 1985 and was RCRA closed in 1986.
Wastes Managed:	This unit managed used degreasing solvents (F001).
Release Controls:	This unit was located indoors on a concrete floor.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	PRC observed the area of this unit and noted that raw materials are now stored at this location (see Photograph No. 3).
SWMU 4	**Waste Collection Area**
Unit Description:	This unit consists of three steel 55-gallon drums. This area measures about 8 by 8 feet and is located indoors on a concrete floor. No drains are present in the area.
Date of Startup:	This unit began operation in 1982.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages used oil, used oil with small amounts of antifreeze, and used agitene (D001). When the individual drums of this unit are filled, they are moved to the Container Staging Area (SWMU 2) to be logged. Then the drums are moved to the Current

	Container Storage Area (SWMU 1) where they are picked up by CWM for recycling. The CBP facility generates about 75 gallons of used oil, about 75 gallons of used oil with small amounts of antifreeze, and about 200 gallons of used agitene each year.
Release Controls:	This unit is located indoors on a concrete floor.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	During the VSI, this unit contained three steel 55-gallon drums. One drum contained used oil, the second drum contained used oil with small amounts of used antifreeze, and the third drum contained used agitene (D001). The concrete floor of this unit did not appear to be cracked. PRC noted no evidence of release (see Photograph No. 4).
SWMU 5	**Scrap Aluminum Accumulation Area**
Unit Description:	This unit measures about 30 by 50 feet and is located indoors on a concrete floor. Two oil traps are in the area because presses were formerly located near this unit. No other floor drains are in the area.
Date of Startup:	This unit began operation in the early 1940s.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages scrap aluminum. The scrap aluminum is collected, baled, and stored at this unit until it is picked up for recycling by the original vendor. The CBP facility generates about 42,500 pounds of scrap aluminum every 3 weeks.
Release Controls:	This unit is located indoors on a concrete floor.

History of Documented Releases:	No releases from this unit have been documented.
Observations:	During the VSI, this unit contained about 50 bales of aluminum on wooden pallets. The concrete floor beneath this unit did not appear to be cracked. PRC noted no evidence of release (see Photograph No. 5).
SWMU 6	**Scrap Glass Accumulation Area**
Unit Description:	This unit measures approximately 10 by 20 feet. A roll-off box, measuring approximately 3 by 3 by 15 feet, is located in this unit. This unit is located indoors on a concrete floor. An oil trap is present in the floor near this unit.
Date of Startup:	This unit began operation in the early 1940s.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages scrap glass. The scrap glass is not recyclable and is shipped off site to be landfilled at the Doherty Landfill near Geneva, Ohio. The CBP facility generates about 20 cubic yards of scrap glass per week.
Release Controls:	This unit is located indoors on a concrete floor.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	During the VSI, a cart measuring approximately 3 by 2 by 2 feet and the roll-off box were filled with scrap glass. The concrete floor near this unit did not appear to be cracked. A small amount of scrap glass was on the floor near the roll-off box (see Photograph No. 6).

SWMU 7	**Burnishing Sludge Accumulation Area**
Unit Description:	This unit consists of one steel 55-gallon drum indoors on a concrete floor near the burnishing system. No floor drains are present in the area.
Date of Startup:	This unit began operation in 1985.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages sludge from the burnishing system. When the drum of this unit is filled, it is moved to the Container Staging Area (SWMU 2) to be logged in before it is moved to the Current Container Storage Area (SWMU 1) where it is picked up by CWM for recycling. The CBP facility generates about 75 gallons of burnishing sludge each year.
Release Controls:	This unit is located indoors on a concrete floor.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	This unit contained about 25 gallons of sludge during the VSI. The cap of the drum was closed. The concrete floor near this unit did not appear to be cracked. PRC noted no evidence of release (see Photograph No. 7).
SWMU 8	**Perchloric Sludge Accumulation Area**
Unit Description:	This unit consists of one steel 55-gallon drum indoors on a concrete floor. No floor drains are present in the area.
Date of Startup:	This unit began operation in 1982.
Date of Closure:	This unit is active.

Wastes Managed:	This unit manages perchloric sludge (F001). When the drum of this unit is filled, it is moved to the Container Staging Area (SWMU 2) to be logged in before it is moved to the Current Container Storage Area (SWMU 1) where it is picked up for recycling by the original vendor, Gold Shield Solvents. The CBP facility generates about 75 gallons of perchloric sludge each year.
Release Controls:	This unit is located indoors on a concrete floor.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	During the VSI, the drum of this unit was closed. The concrete floor near this unit did not appear to be cracked. PRC noted no evidence of release (see Photograph No. 8).
SWMU 9	**Waste Paint Accumulation Area**
Unit Description:	This unit consists of one steel 55-gallon drum indoors on a concrete floor.
Date of Startup:	This unit began operation in 1984 or 1985.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages waste paint (D001). When the drum of this unit is filled, it is moved to the Container Staging Area (SWMU 2) to be logged in before it is moved to the Current Container Storage Area (SWMU 1) where it is picked up for recycling by CWM. The CBP facility generates about 30 gallons of waste paint each year.
Release Controls:	This unit is located indoors on a concrete floor.
History of Documented Releases:	No releases from this unit have been documented.

Observations:	During the VSI, the drum of this unit was closed. The concrete floor near this unit did not appear to be cracked. PRC noted small amounts of paint have stained the floor in this area (see Photograph No. 9).
SWMU 10	**Wastewater Treatment System**
Unit Description:	This unit is in a separate building from the main facility building and occupies approximately 3,000 square feet. This unit adjusts the pH of effluent from manufacturing processes and filters the effluent before discharging it to the municipal sewer system under the City of Conneaut's Permit No. 490-993. This system consists of two reaction tanks, each with a 470 gallon capacity, two retention tanks, each with a 4,400 gallon capacity, and a 150-square-foot drum-type filter. Wastewater treatment sludge from filtering is collected in a roll-off box in SWMU 10.
Date of Startup:	This unit began operation in 1957.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages solution from the burnishing system and water soluble oils used to lubricate equipment. This unit generates approximately 130 cubic yards of nonhazardous wastewater treatment sludge per year. The sludge is removed off site and landfilled at the Doherty Landfill near Geneva, Ohio.
Release Controls:	This unit is located indoors on a concrete floor.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	During the VSI, this unit was in operating. Wastewater treatment sludge from filtering the effluent was being collected in a roll-off

box. PRC noted no evidence of release (see Photographs No. 10 and 11).

4.0 AREAS OF CONCERN

PRC identified no AOCs during the PA/VSI.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified 10 SWMUs and no AOCs at the CBP facility. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. Following are PRC's conclusions and recommendations for each SWMU. Table 3, at the end of this section, summarizes the SWMUs at the facility and the recommended further actions.

SWMUs 1, 2, and 4 **Current Container Storage Area, Container Staging Area, and Waste Collection Area**

Conclusions: These units store used oil, used oil with small amounts of antifreeze, used agitene (D001), burnishing system sludge (D001), perchloric sludge (F001), and waste paint (D001) in steel 55-gallon drums. No releases from these drums have been documented. Because these drums are indoors on concrete floors and because they are stored closed, they pose a low potential for release to ground water, surface water, air, and on-site soils.

Recommendations: PRC recommends no further action for SWMUs 1, 2, and 4 at this time.

SWMU 3 **Former Container Storage Area**

Conclusions: This unit was RCRA-closed in 1987. No releases from this unit have been documented. Because this unit is no longer active and has been replaced by a raw material storage area, it poses a low potential for release to ground water, surface water, air, and on-site soils.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMUs 5 and 6 **Scrap Aluminum Accumulation Area and Scrap Glass Accumulation Area**

Conclusions: The Scrap Aluminum Accumulation Area (SWMU 5) stores scrap aluminum until it is picked up for recycling by the original vendor. The Scrap Glass Accumulation Area (SWMU 6) stores scrap glass until it is removed off site for landfilling. Because both SWMUs 5 and 6 are located indoors, on concrete floors, and manage nonhazardous wastes, they pose a low potential for release to ground water, surface water, air, and on-site soils.

Recommendations: PRC recommends no further action for SWMUs 5 and 6 at this time.

SWMU 7, 8, and 9 **Burnishing Sludge Accumulation Area, Perchloric Sludge Accumulation Area, and Waste Paint Accumulation Area**

Conclusions: The Burnishing Sludge Accumulation Area (SWMU 7) manages burnishing system sludge (D001). The Perchloric Sludge Accumulation Area (SWMU 8) manages perchloric sludge (F001). The Waste Paint Accumulation Area (SWMU 9) manages waste paint (D001). SWMUs 7, 8, and 9 each manage one steel 55-gallon drum stored closed when not in use. No releases from these units have been documented. Because SWMUs 7, 8, and 9 are located indoors on concrete floors, they pose a low potential for release to ground water, surface water, air, and on-site soils.

Recommendations: PRC recommends no further action for SWMUs 7, 8, and 9 at this time.

SWMU 10 **Wastewater Treatment System**

Conclusions: This unit manages solution from the burnishing system and water-soluble oils used to lubricate equipment. No releases from this unit have been documented. Because this unit is indoors on a concrete floor and because treated effluent from this unit is discharged to the municipal sewer system under the City of Conneaut's Permit No. 490-993, it poses a low potential for release to ground water, surface water, air, and on-site soils.

Recommendations: PRC recommends no further action for SWMU 10 at this time.

TABLE 3

SWMU SUMMARY

SWMU	Dates of Operation	Evidence of Release	Recommended Further Action
1. Current Container Storage Area	1985 to present	None	None
2. Container Staging Area	1986 to present	None	None
3. Former Container Storage Area	1980 to 1985; RCRA-closed in 1986	None	None
4. Waste Collection Area	1982 to present	None	None
5. Scrap Aluminum Accumulation Area	Early 1940s to present	None	None
6. Scrap Glass Accumulation Area	Early 1940s to present	None	None
7. Burnishing Sludge Accumulation Area	1985 to present	None	None
8. Perchloric Sludge Accumulation Area	1982 to present	None	None
9. Waste Paint Accumulation Area	1984 or 1985 to present	None	None
10. Wastewater Treatment System	1957 to present	None	None

REFERENCES

Federal Emergency Management Agency (FEMA), 1980. Flood Insurance Rate Map - City of Conneaut, Ohio, Ashtabula County, Community-Panel Number 390012 0005 3.

GE, 1980a. Notification of Hazardous Waste Activity, July 15.

GE, 1980b. RCRA Part A Permit Application, November 17.

GE, 1985. Letter to Mark Bergman, Ohio Environmental Protection Agency (OEPA), from Walt Nielsen, GE, February 22.

OEPA, 1981. Letter to B.L. Witek, GE, from Paul Flanigan, OEPA, August 31.

OEPA, 1982. Letter to B.H. Cowgill, GE, from Helen Tabacs, OEPA, July 29.

OEPA, 1983. Letter to Walter Nielsen, GE, from Mark Bergman, OEPA, June 21.

OEPA, 1985. Letter to Walter Nielsen, GE, from Mark Bergman, OEPA, March 8.

OEPA, 1986. Inter-office Communication to Tom Carlisle, OEPA, from Mark Bergman, OEPA, June 2, 1986.

PRC Environmental Management Inc. (PRC), 1993a. Record of Telephone Conversation between Sandy Anagnostopoulos, PRC, and Barney Blose, Conneaut Water Department, January 6.

PRC, 1993b. Record of Telephone Conversation between Sandy Anagnostopoulos, PRC, and Carl Heinonen, GE, January 6.

PRC, 1993c. Record of Telephone Conversation between Sandy Anagnostopoulos, PRC, and Carl Heinonen, GE, January 21.

PRC, 1993d. Record of Telephone Conversation between Sandy Anagnostopoulos, PRC, and Carl Heinonen, GE, February 8.

Rand McNally Business Traveler's Road Atlas, 1992.

U.S. Department of Agriculture (USDA), 1973. Soil Survey of Ashtabula County, May.

U.S. Department of Commerce (DOC), 1968. Climatic Atlas of the United States.

U.S. Environmental Protection Agency (EPA), 1986. Letter to Eugene Apple, GE, from Karl Bremer, EPA, October 8.

U.S. Geological Survey (USGS), 1960. Conneaut, Ohio - Pennsylvania Quadrangle, 7.5 Minute Topographic Series, Photorevised 1970.

Woodward Clyde Consultants, 1986. Hydrogeological Assessment of Ashtabula County, March 28.

ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
OH	OHD 004 202 735

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)	02 STREET, ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER
General Electric Compnay (GE) - Conneaut Base Plant (CBP)	880 Maple Avenue

03 CITY	04 STATE	05 ZIP CODE	06 COUNTY	07 COUNTY CODE	08 CONG DIST
Conneaut	OH	44030	Ashtabula		

09 COORDINATES: LATITUDE	LONGITUDE
41° 59' 30" N	80° 34' 45" W

10 DIRECTIONS TO SITE (Starting from nearest public road)

From I-90, take Highway 7 north. Go west on Madison Street, which turns into Reig Avenue. Go one block on Reig Avenue to Maple Avenue. The facility is located on the corner of Reig and Maple Avenues.

III. RESPONSIBLE PARTIES

01 OWNER (If known)	02 STREET (Business, mailing residential)
	3135 Eastern Turnpike - W1B

03 CITY	04 STATE	05 ZIP CODE	06 TELEPHONE NUMBER
Fairfield	CT	06431	

07 OPERATOR (If known and different from owner)	08 STREET (Business, mailing, residential)
General Electric Company - Conneaut Base Plant (CBP)	880 Maple Avenue

09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER
Conneaut	OH	44030	(216) 593-1156

13 TYPE OF OWNERSHIP (Check one)

■ A. PRIVATE ☐ B. FEDERAL: _____ (Agency Name) ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL

☐ F. OTHER _____ (Specify) ☐ G. UNKNOWN

14. OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

■ A. RCRA 3010 DATE RECEIVED: 07 / 15 / 80 (MONTH DAY YEAR) ☐ B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: / / (MONTH DAY YEAR) ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

■ YES DATE 11 / 17 / 92 ☐ NO

BY (Check all that apply)

☐ A. EPA ■ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR ☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ (Specify)

CONTRACTOR NAME(S): PRC Environmental Management, Inc. (PRC)

02 SITE STATUS (Check one)	03 YEARS OF OPERATION
■ A. ACTIVE ☐ B. INACTIVE ☐ C. UNKNOWN	1941 (BEGINNING YEAR) / Present (ENDING YEAR) ☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

The following hazardous wastes are currently generated on site: used agitene (D001); burnishing system sludge (D001); perchloric sludge (F001); and waste paint (D001).

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

A low potential hazard to the environment and population exists because all hazardous wastes are well managed in accordance with appropriate regulations.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)

☐ A. HIGH (Inspection required promptly) ☐ B. MEDIUM (Inspection required) ■ C. LOW (Inspect on time-available basis) ☐ D. NONE (No further action needed; complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF (Agency/Organization)	03 TELEPHONE NUMBER
Kevin Pierard	U.S. EPA	(312) 886-4448

04 PERSON RESPONSIBLE FOR ASSESSMENT	05 AGENCY	06 ORGANIZATION	07 TELEPHONE NUMBER	08 DATE
Sandy Anagnostopoulos		PRC	(312) 856-8700	01 / 22 / 93 (MONTH DAY YEAR)

ATTACHMENT B
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

General Electric Company (GE) -
Conneaut Base Plant (CBP)
880 Maple Avenue
Conneaut, Ohio 44030
OHD 004 202 735

Date:	November 17, 1992
Primary Facility Representative:	Carl Heinonen, Safety and Environmental Engineering
Representative Telephone No.:	(216) 593-1156
Additional Facility Representatives:	Edward Klimpel, Manufacturing Engineering Tom Harlon, RCRA Environmental Specialist
Inspection Team:	Sandy Anagnostopoulos, PRC Environmental Management, Inc. (PRC) Lorraine Morris, PRC
Photographer:	Sandy Anagnostopoulos, PRC
Weather Conditions:	Cloudy and snowing; approximately 25 °F
Summary of Activities:	The visual site inspection (VSI) began at 8:45 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated, and release history. Facility representatives provided the inspection team with copies of requested documents. The VSI tour began at 9:35 a.m. Each solid waste management unit (SWMU) was observed and photographed. The tour concluded at 10:35 a.m., after which the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 11:20 a.m.